

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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| <p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND<br/>MANAGEMENT BOARD FOR PUERTO RICO,<br/>as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al</i><br/>Debtor<sup>1</sup></p>   | <p>PROMESA Title III</p> <p>Case No. 17-BK-03283-LTS</p> <p>(Jointly Administered)</p> |
| <p>THE OFFICIAL COMMITTEE OF UNSECURED<br/>CREDITORS OF THE COMMONWEALTH OF<br/>PUERTO RICO,<br/>as agent of,</p> <p>THE FINANCIAL OVERSIGHT AND<br/>MANAGEMENT BOARD FOR PUERTO RICO<br/>as representative of,</p> <p>THE COMMONWEALTH OF PUERTO RICO,<br/>Plaintiff</p> <p>v.</p> <p>BETTINA WHYTE,<br/>as agent of</p> <p>THE FINANCIAL OVERSIGHT AND<br/>MANAGEMENT BOARD FOR PUERTO RICO<br/>as representative of</p> <p>THE PUERTO RICO SALES TAX FINANCING<br/>CORPORATION,<br/>Defendant.</p> | <p>Adv. Proc. No. 17-00257 (LTS)</p>   |

**JOINDER OF FEDERACIÓN DE MAESTROS DE PUERTO RICO TO DOCKET  
ENTRY 4251: OBJECTION OF PROSOL-UTIER TO COMMONWEALTH OF  
PUERTO RICO'S MOTION PURSUANT TO BANKRUPTCY RULE 9019 FOR ORDER**

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<sup>1</sup> The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

**APPROVING SETTLEMENT BETWEEN COMMONWEALTH OF PUERTO RICO  
AND PUERTO RICO SALES TAX FINANCING CORPORATION [DOCKET ENTRY  
4067]**

COMES NOW, Federación de Maestros de Puerto Rico, creditor and party in interest, through its undersigned attorneys, and before this Honorable Court very respectfully states and prays:

1. Federación de Maestros de Puerto Rico (“Federación”) is a workers organization composed by over 2,000 active and retired teachers of the Department of Education of Puerto Rico. It is recognized by the Department of Labor as a *bona fide* organization under Act 134 of June 19, 1960. It was incorporated at the Department of State of Puerto Rico as a not for profit organization on November 9, 1966.

2. On October 19, 2018, the Financial Oversight and Management Board (“FOMB”) filed the *Commonwealth of Puerto Rico’s Motion Pursuant to Bankruptcy Rule 9019 for Order Approving Settlement Between Commonwealth of Puerto Rico and Puerto Rico’s Sales Tax Financing Corporation* [Docket Entry No. 4067].

3. Federación’s employees and retirees are directly affected by the Commonwealth’s determinations in these Title III proceedings. Federación’s members are also participants of the Employees’ Retirement System of the Commonwealth, a covered territorial instrumentality, subject to the pension reform according to the Commonwealth of Puerto Rico New Fiscal Plan certified on October 23, 2018. Thus, the appearing labor union and retirees are parties in interest and creditors of the Commonwealth that will be severely affected by the approval of the proposed settlement for decades to come.

4. On November 16, 2018, PROSOL-UTIER, at Docket Entry No. 4251, filed an objection to the October 19, 2018 *Commonwealth of Puerto Rico’s Motion Pursuant to*

*Bankruptcy Rule 9019 for Order Approving Settlement Between Commonwealth of Puerto Rico and Puerto Rico's Sales Tax Financing Corporation* [Docket Entry No. 4067] ("Objection of PROSOL-UTIER").

5. The proposed settlement is not in the best interest of the Commonwealth, is not in compliance with PROMESA and results in a direct injury to the People of Puerto Rico, particularly, Federación's members and retirees.

6. For the above stated reasons, Federación hereby submits this joinder to the Objection of PROSOL-UTIER [Docket Entry No. 4251].

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above for all relevant purposes and deny the motion *Commonwealth of Puerto Rico's Motion Pursuant to Bankruptcy Rule 9019 for Order Approving Settlement Between Commonwealth of Puerto Rico and Puerto Rico's Sales Tax Financing Corporation* [docket entry 4067].

In Ponce, Puerto Rico, this 16<sup>th</sup> day of November 2018.

Respectfully submitted,

/s/Rolando Emmanuelli Jiménez  
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/s/Jessica E. Méndez Colberg  
USDC: 302108

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**WE HEREBY CERTIFY** that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. Paper copies have been mailed pursuant to Section II of the *Seventh Amended Notice, Case Management and Administrative Procedures*:

- (i) Chambers of the Honorable Laura Taylor Swain (two copies shall be delivered to the chambers):  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Suite No. 3212  
New York, New York 10007-1312;
- (ii) Office of the United States Trustee for Region 21  
Edificio Ochoa, 500 Tanca Street, Suite 301  
San Juan, PR 00901-1922

/s/Rolando Emmanuelli Jiménez  
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/s/Jessica E. Méndez Colberg  
USDC: 302108